

**UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF NORTH CAROLINA**

SHAUNA WILLIAMS, et al.,

*Plaintiffs,*

v.

REPRESENTATIVE DESTIN HALL, in his  
official capacity as Chair of the House Standing  
Committee on Redistricting, et al.,

*Defendants.*

Civil Action No. 23 CV 1057

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NORTH CAROLINA STATE CONFERENCE OF  
THE NAACP, et al.,

*Plaintiffs,*

v.

PHILIP BERGER, in his official capacity as the  
President Pro Tempore of the North Carolina  
Senate, et al.,

*Defendants.*

Civil Action No. 23 CV 1104

***WILLIAMS* PLAINTIFFS' MOTION TO STRIKE OUT OF SCOPE  
CONTENT IN DR. BARBER'S MARCH 17, 2025 REPORT**

*Williams* Plaintiffs move to strike various opinions and analyses in Dr. Michael Barber's March 17, 2025 Report that are plainly outside the scope of the parties' agreed-upon supplemental expert discovery and as contemplated by Rule 26(e).

In support of this motion, *Williams* Plaintiffs contemporaneously file a supporting memorandum of law. For the reasons in their supporting memorandum, *Williams* Plaintiffs respectfully request that the Court strike all parts of Dr. Barber's March 17, 2025 report on pages 3–31, except for the first full paragraph on page 15 and Table 1 on page 16.

Dated: March 25, 2025

/s/ Narendra K. Ghosh  
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*\* Special Appearance pursuant to  
Local Rule 83.1(d)*

### **CERTIFICATE OF CONFERENCE**

Pursuant to Local Rule 37.1(a), I certify that after consultation and diligent attempts to resolve differences, the parties are unable to reach an accord as to the issues in dispute in this Motion to Strike Out of Scope Opinions and Analyses in Dr. Barber's March 17, 2025 Report. Counsel for the parties held a video conference meet-and-confer on March 24, 2025. Counsel for *Williams* Plaintiffs Alison (Qizhou) Ge, Mark Haidar, and Narendra Ghosh were present, and Counsel for Legislative Defendants Alyssa Riggins, Patrick T. Lewis, and Cassie Holt were present. Parties shared their positions, but no resolution was reached.

Dated: March 25, 2025

By: /s/ Abha Khanna